

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MARTIN J. WALSH, Secretary of Labor,
United States Department of Labor,

Plaintiff,

V.

AEU BENEFITS, LLC, et al,

Defendants.

CIVIL ACTION NO.
1:17-cv-07931-JHL-SMF

Hon. John F. Kness
District Judge

**JOINT MOTION TO AMEND CONSENT ORDER AND JUDGMENT AS TO
AEU BENEFITS, LLC, AEU HOLDINGS, LLC, HALO P & C NORTH AMERICA,
LLC, HALO ADVISORS, LLC, STEPHEN SATLER, AND STEVEN GOLDBERG**

Plaintiff **MARTIN J. WALSH**, Secretary of Labor, United States Department of Labor (“Secretary”), and Defendants **AEU BENEFITS, LLC, AEU HOLDINGS, LLC, HALO P & C NORTH AMERICA, LLC, HALO ADVISORS, LLC, STEPHEN SATLER, AND STEVEN GOLDBERG**, (together, “AEU Defendants”), hereby move the Court to amend the Consent Order and Judgment at Docket No. 544. In support thereof, the Secretary and the AEU Defendants state as follows:

1. The Secretary and the AEU Defendants agreed to resolve all matters in controversy in this action between them (except for the imposition by the Secretary of any penalty pursuant to ERISA § 502(l), 29 U.S.C. § 1132(l), and any proceedings related thereto), and consented to entry of a Consent Order and Judgment by this Court.

2. The Court entered the Consent Order and Judgment on September 21, 2020, at Docket No. 544.

3. The AEU Defendants made payments from September 1, 2020 through June 1, 2022 as required by the Consent Order and Judgment. Thereafter, the AEU Defendants provided new financial disclosures that showed an inability to comply with the Consent Order and Judgment due to extraordinary circumstances.

4. The AEU Defendants seek to pause the monthly payments for June 2022 through September 2022. Beginning on October 1, 2022 and thereafter, the monthly payments will be increased to \$33,150.83/month and continue at this amount for 18 months (final payment of \$33,150.83 due on March 1, 2024).

5. The Secretary, having reviewed the financial documentation previously provided and based on the AEU Defendants' extraordinary circumstances, is willing to accept the AEU Defendants' proposed, revised payment plan.

WHEREFORE, the parties jointly request the Court enter the proposed Amended Consent Order and Judgment with changes to Paragraphs 8 and 9 that incorporate the proposed changes herein. The Amended Consent Order and Judgment with the changes stated herein has been submitted to the Court's proposed order email address.

Respectfully submitted,

For the **SECRETARY OF LABOR**:

SEEMA NANDA
Solicitor of Labor

CHRISTINE Z. HERI
Regional Solicitor

/s/ JoAnn G. Lim
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